



United States Environmental Protection Agency  
Region 1 – New England  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

**Certified Mail - Return Receipt Requested**

**APR 27 2016**

Stephen Knox, Chair  
Board of Selectmen  
Town of Lisbon  
46 School Street  
Lisbon, NH 03585

Re: Publicly Owned Treatment Works General NPDES Permit No. NHG580421  
Town of Lisbon, New Hampshire  
Request for Information Pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a)  
Docket No. CWA-308-R01-FY16-62

Dear Mr. Knox:

EPA issued Publicly Owned Treatment Works General NPDES Permit No. NHG580421 ("NPDES Permit") to the Town of Lisbon, New Hampshire ("Town") on April 17, 2012. Paragraphs D.4., D.5. and D.6. of Part II of the NPDES Permit required the Town to: (1) prepare maps of its wastewater collection system by October 17, 2014; (2) implement and submit a copy to EPA and NHDES of its full Collection System Operation and Maintenance Plan ("O&M Plan") by April 17, 2014; and (3) beginning in 2015, submit O&M Plan implementation summary reports by March 31<sup>st</sup> annually. Neither EPA nor the New Hampshire Department of Environmental Services ("NHDES") have received these documents.

Section 308(a) of the Federal Clean Water Act (the "Act"), 33 U.S.C. § 1318(a), authorizes the EPA to require any owner or operator of a point source to provide information needed to determine whether there has been a violation of the Act. The Town is hereby required, pursuant to Section 308(a) of the Act, 33 U.S.C. § 1318(a), to respond to this Request for Information (the "Request") by May 16, 2016. Please read the instructions in Attachment 1 carefully before preparing your response and answer each question in Attachment 2 as clearly and completely as possible.

Your response to this Request must also be accompanied by a certificate that is signed and dated by the person who is authorized to respond to the Request. A Statement of Certification, Attachment 3, is attached to this letter.

Information submitted pursuant to this Request shall be sent both in hard copy and electronic copy by certified mail and shall be addressed as follows:

United States Environmental Protection Agency  
New England Region  
5 Post Office Square Suite 100 (OES 04-03)  
Boston, MA 02109-3912  
Attn: Joy Hilton  
[hilton.joy@epa.gov](mailto:hilton.joy@epa.gov)

and

New Hampshire Department of Environmental Services  
Wastewater Engineering Bureau  
29 Hazen Drive, P.O. Box 95  
Concord, NH 03302-0095  
Attn: Tracy Wood, P.E., Administrator  
[Tracy.Wood@des.nh.gov](mailto:Tracy.Wood@des.nh.gov)

Compliance with this Request is mandatory. Failure to respond fully and truthfully, or to adequately justify any failure to respond, within the time frame specified above, also constitutes a violation of the Clean Water Act subject to enforcement action, including the assessment of penalties. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal prosecution under 18 U.S.C. § 1001.

The Town may assert a business confidentiality claim with respect to part or all of the information submitted to EPA in the manner described at 40 C.F.R. Part 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is submitted to EPA, the information may be made available to the public by EPA without further notice to the Town.

If you have questions regarding this Request, please contact Joy Hilton of my staff at 617-918-1877 or have your attorney contact Jeffrey Kopf, Senior Enforcement Counsel, at 617-918-1796.

Sincerely,



James Chow, Manager  
Technical Enforcement Programs  
Office of Environmental Stewardship

Attachments

cc: Tracy Wood, NHDES

**Attachment 1**  
**Information Request Instructions**

1. Please provide a separate narrative response to each and every question and subpart of a question set forth in this Request. Precede each answer with the text and the number of the question and the subpart to which the answer corresponds.
2. If any question cannot be answered in full, answer to the extent possible. If your responses are qualified in any manner, please explain.
3. Any documents referenced or relied upon by you to answer any of the questions in the Request must be copied and submitted to EPA with your response. All documents must contain a notation indicating the question and subpart to which they are responding. If the documentation that supports a response to one item duplicates the documentation that supports another item, submit one copy of the documentation and reference the documentation in subsequent responses.
4. If information or documents not known or not available to the Town as of the date of the submission of its response to this Request should later become known, or available to the Town, the Town must supplement its response. Moreover, should the Town find at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, the Town must notify the EPA and the NHDES of this fact as soon as possible and provide a corrected response.





**Attachment 2**  
**Respond to the Following**

With respect to the wastewater collection system owned by the Town of Lisbon, New Hampshire ("Town"), provide the following information by **May 16, 2016**:

1. A copy of maps of the Town's sewer collection system. In accordance with NPDES Permit No. NHG580421 ("NPDES Permit"), the maps shall be on street maps of the community, with sufficient detail and at a scale to allow for easy interpretation. Also, the collection system information shown on the maps shall be based on current conditions, and at a minimum shall include the following:
  - a. All sanitary sewer lines and related manholes;
  - b. All combined sewer lines, related manholes, and catch basins;
  - c. All combined sewer regulators and any known or suspected connections between the sanitary sewer and storm drain system (e.g. combined manholes);
  - d. All outfalls, including the treatment plant outfall(s), combined sewer overflow outfalls ("CSOs"), combined manholes, and any known or suspected sanitary sewer overflows ("SSOs");
  - e. All pump stations and force mains;
  - f. The wastewater treatment facility(ies);
  - g. All surface waters (labeled);
  - h. Other major appurtenances such as inverted siphons and air release valves;
  - i. A numbering system which uniquely identifies manholes, catch basins, overflow points, regulators and outfalls;
  - j. The scale and a north arrow; and
  - k. The pipe diameter, date of installation, type of material, distance between manholes, and the direction of flow.
2. A copy the Town's collection system operation and maintenance plan. In accordance with the NPDES Permit, the plan shall include:
  - a. A description of the collection system management goals, staffing, information management, and legal authorities;
  - b. A description of the overall condition of the collection system including a list of recent studies and construction activities;
  - c. A preventative maintenance and monitoring program for the collection system;
  - d. Sufficient staffing to properly operate and maintain the sanitary sewer collection system;
  - e. Sufficient funding and the source(s) of funding for implementing the plan;
  - f. Identification of known and suspected overflows and back-ups, including combined manholes, a description of the cause of the identified overflows and back-ups, and a plan for addressing the overflows and back-ups consistent with the requirements of the General Permit;
  - g. A description of the permittee's programs for preventing infiltration and inflow ("I/I") related effluent violations and all unauthorized discharges of wastewater, including overflows and bypasses and the ongoing program to identify and remove sources of I/I. The program shall include an inflow identification and control program that focuses on the disconnection and redirection of illegal sump pumps and roof down spouts; and

- h. An educational public outreach program for all aspects of I/I control, particularly private inflow.
- 3. A copy of the Town's summary report of activities related to the implementation of its Collection System O&M Plan during the 2014 and 2015 calendar years. In accordance with the NPDES Permit, the summary report shall, at a minimum, include:
  - a. A description of the staffing levels maintained during the 2014 and 2015 calendar years;
  - b. A map and a description of inspection and maintenance activities conducted and corrective actions taken during the 2014 and 2015 calendar years;
  - c. Expenditures for any collection system maintenance activities and corrective actions taken during the 2014 and 2015 calendar years;
  - d. A map with areas identified for investigation/action in calendar year 2016;
  - e. If the wastewater treatment plant's flows have reach 80% of the facility's design flow or if there have been capacity-related overflows, submit a calculation of the maximum daily, weekly, and monthly infiltration and the maximum daily, weekly, and monthly inflow for 2014 and 2015; and
  - f. A summary of unauthorized discharges that occurred during 2014 and 2015 and their causes and a report of any corrective actions taken as a result of the unauthorized discharges in accordance with Paragraph III.G. of the NPDES Permit.
- 4. If any of the information requested in Items 1 through 3 above is not available, please submit a current status report and a proposed schedule for preparing each of the documents as soon as practicable.

**End of Questions**

### ATTACHMENT 3

**Statement of Certification**  
**Docket No. CWA-308-R01-FY16-62**

Complete and Include With Your Response

I declare under penalty of perjury that I am authorized to respond on behalf of the Town of Lisbon, New Hampshire. I certify that the foregoing responses and information submitted were prepared by me, or under my direction or supervision, and that I have personal knowledge of all matters set forth in the responses and the accompanying information. I certify that the responses are true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

By \_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Print Name)

\_\_\_\_\_  
(Title)

\_\_\_\_\_  
(Date)

